

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Chapter13
Shasia Willis

(DEBTOR) Bankruptcy No. 20-13521AMC13

**RESPONSE OF CIBIK & CATALDO, P.C. TO CERTIFICATION IN OPPOSITION OF
APPLICATION FOR COMPENSATION**

Cibik & Cataldo, P.C. was never served with the certification in opposition or the notice of a scheduled hearing. Counsel learned of the hearing while checking the court docket to see if an amended plan had been filed. In response to the averments Cibik & Cataldo P.C. state as follows:

1 - 5 Admitted.

6 – 14 Denied. Cibik & Cataldo, P.C. was responsive. There were countless emails as well as phone call appointments. Counsel was doing everything they could to prevent an Adversary Action. Counsel was trying to avoid the Adversary by cooperating and getting responses to inquiries and document requests to counsel for the creditor. Ms. Willis over several months failed to get all documents and made promises to provide items by certain dates but failed to do so.

The process was explained to her countless times. She kept stating we were “not pushing back.” We explained that we believed the Adversary would be defensible. We explained that cooperation and documentation production was the way to avoid expensive litigation.

Cibik & Cataldo, PC, can present testimony and email chains from September 1, 2020 through January 28, 2021 which show;

1. Efforts to explain the process
2. Efforts to avoid expensive litigation
3. Debtor's non-production of documents
4. Debtor's promises of dates for production without meeting those dates
5. Opposing counsel's Adversary Action caused by non-production of requested documents and information

WHEREFORE, Cibik & Cataldo, P.C. seeks and Order approving the fee application in the amount of \$6,000.00.

Respectfully submitted,

Date: April 6, 2021

BY: /s/ Michael A. Cataldo
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